

EXHIBIT A

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
)
)
v.) CASE NO. 3:24-cr-00151
)
)
MATTHEW ISAAC KNOOT) JUDGE ELI RICHARDSON

STIPULATION

It is hereby stipulated and agreed among the parties that:

1. The Victim Companies (the “Victim Companies”) may testify at trial using pseudonyms (Company A, Company B, Company C, etc.) and without revealing their corporate name, business addresses, or other identifying information;
2. The Victim Companies’ representatives may testify at trial using their first name and last initial, and without revealing their full name, corporate name, business addresses, or other identifying information;
3. The individual victim identified in Government’s indictment (DE #3) (the “Individual Victim”) may testify at trial under pseudonym (Andrew M. or A.M.) and without revealing their full name, full date of birth, full social security number, or other identifying information;
4. All trial participants, including counsel for the Government, the Government’s witnesses, counsel for the Defendant, the Defendant, and the Defendant’s witnesses, shall refer to the Victim Companies, the Victim Companies’ representatives, and the Individual Victim, by pseudonym, as contemplated by this Stipulation;
5. Prior to trial, the Government will provide a key indicating the witnesses’ true name and affiliation, along with their respective pseudonym, to the Court and Counsel for the Defendant.

For example, "Company X = Made Up Corp., and Company's X's representative = Ms. Anon Y. Mous." This document shall not be filed on the public docket, kept in strict confidence, and remain in the Courthouse. Any violation of this Stipulation, as determined by the Court, will require, in addition to any other sanction deemed appropriate by the Court, the immediate redaction of the individual victim or Victim Companies' name from the trial transcript;

6. The same key will be provided to the jury during the pendency of trial and during its deliberations. At the end of each day of trial, the Court will collect the key from all parties and maintain it in strict confidence for the duration of the trial; and

7. At the conclusion of trial, the Government will collect all copies of the key, maintain one in its records, and destroy all remaining copies.

Respectfully Submitted,

s/ Joshua A. Kurtzman
JOSHUA A. KURTZMAN
Assistant United States Attorney

s/ Gregory J. Nicosia
GREGORY J. NICOSIA
Department of Justice Trial Attorney

SEEN AND AGREED:

MATTHEW ISAAC KNOOT
Defendant

DAVID FLETCHER
Counsel for Defendant